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Attorneys for Defendants

6 *Frias Transportation Management;*

Virgin Valley Cab Company, Inc.; Ace Cab, Inc.;

7 *A-N.L.V. Cab Co.; Union Cab Co.; and*

Vegas-Western Cab, Inc.

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 TADIOS TESSEMA, INDIVIDUALLY, and
13 as the former UNIT CHAIR of the FRIAS
TRANSPORTATION BARGAINING
14 UNIT, LOCAL 711A, UNITED STEEL,
PAPER AND FORESTRY, RUBBER,
15 MANUFACTURING, ENERGY, ALLIED
INDUSTRIAL AND SERVICE WORKERS
16 INTERNATIONAL UNION,

17 Plaintiff,

18 v.

19 UNITED STEEL, PAPER AND
FORESTRY, RUBBER,
20 MANUFACTURING, ENERGY, ALLIED
INDUSTRIAL AND SERVICE WORKERS
INTERNATIONAL UNION; LEO W.
21 GERARD; ROBERT LaVENTURE;
MANUEL ARMENTA; CHRIS
22 YOUNGMARK; ACE CAB, INC.; UNION
CAB CO.; VEGAS-WESTERN CAB, INC.;
23 A-N.L.V. CAB CO.; VIRGIN VALLEY
CAB COMPANY, INC.; FRIAS
24 TRANSPORTATION MANAGEMENT,
DOES I-X and ROES XI-XX,

25 Defendants.
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Case No.: 2:13-cv-01782-APG-VCF

**STIPULATION AND ORDER TO EXTEND
DISPOSITIVE MOTION DEADLINE**

(Fifth Request)

1 The parties, by and through their respective counsel of record, hereby stipulate and agree
2 as follows:

3 1. On June 16, 2014, this Court entered its Order setting out the discovery plan and
4 scheduling order dates (Dkt. #74).

5 2. This is the fifth request by the parties to amend the Court's June 16, 2014
6 scheduling order.

7 3. On March 9, 2016, Defendants Frias Transportation Management, Virgin Valley
8 Cab Company, Inc., Ace Cab, Inc., A-N.L.V. Cab Co., Union Cab Co., and Vegas-Western Cab,
9 Inc., (collectively, the "Defendants") served *via* hand delivery, a Fed. R. Civ. P. 11 letter with a
10 Motion for Sanctions attached thereto.

11 4. Plaintiff Tadios Tessema has requested additional time to respond to the
12 Defendants' Fed. R. Civ. P. 11 letter.

13 5. This extension is necessary based on counsels' schedules and the time needed for
14 Plaintiff to respond to Defendants' letter.

15 6. For the above-stated reasons, the parties request that the dispositive motion
16 deadline be extended from March 31, 2016 to April 6, 2016, to accord time for the parties to
17 assess the Defendants' Fed. R. Civ. P. 11 letter.

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20 **PROPOSED SCHEDULE**

21 1. **Dispositive Motions.** The parties shall have through and including April 6, 2016
22 to file dispositive motions.
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1 This stipulation is sought in good faith and not for the purpose of delay.

2 Dated this 31st day of March, 2016.

3
4 LAW OFFICE OF
DAN WINDER, P.C.

JACKSON LEWIS P.C.

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11 GILBERT & SACKMAN,
12 A Law Corporation

13 /s/ Joshua F. Young
14 Joshua F. Young
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Los Angeles, California 90010-2732

15 *Attorneys for Union Defendants*

18 **IT IS SO ORDERED.**

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20 Cam Ferenbach, U.S. Magistrate Judge

21 Dated this 4th day of April, 2016